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VIA ECF

Hon. Philip M. Halpern
United State District Court, Southern District of New York
300 Quarropas Street, Room 530
White Plains, New York 10601

Re: Chang v. Shen Yun Performing Arts, Inc., et. al. (No. 24-cv-08980)

Dear Judge Halpern:

This firm represents defendants (i) Shen Yun Performing Arts, Inc.; (ii) Dragon Springs Buddhist Inc.; (iii) Fei Tian College; and (iv) Fei Tian Academy of the Arts (collectively the "Shen Yun Defendants"). I write to request an extension of time for the Shen Yun Defendants to answer or otherwise respond to the complaint to February 19, 2025.

According to the affidavits of service filed by Plaintiff, the Shen Yun Defendants were served on December 20, 2024, making their responses to the complaint due on or before January 10, 2025. Because of the time lost due to the holidays and the complex factual and legal nature of the allegations in the complaint, we request additional time to evaluate and respond to the Plaintiff's allegations. This is the Shen Yun Defendants' first request for an extension of their time to respond to the complaint. Plaintiff's counsel has advised that Plaintiff does not oppose the requested extension.

Respectfully submitted,

S:/Brendan Goodhouse

cc: All counsel of record (via ECF)